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5 ALLIED COLLECTION SERVICES, INC.

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8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

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11 DEREK LAND,

12 Plaintiff,

13 vs.

14 ALLIED COLLECTION SERVICES, INC.;
15 EXPERIAN INFORMATION SOLUTIONS,
16 INC.' EQUIFAX INFORMATION
SERVICES, LLC; and TRANS UNION LLC,

17 Defendant.

CASE NO. 2:22-cv-01641-APG-EJY

**UNOPPOSED MOTION FOR EXTENSION
OF TIME TO FILE OPPOSITION TO
PLAINTIFF'S OBJECTIONS TO
ATTORNEY FEE MOTION ORDER**

(FIRST REQUEST)

Gordon Rees Scully Mansukhani, LLP
1 East Liberty Street, Suite 424
Reno, NV 89501

1 Defendant Allied Collection Services, Inc. (“Defendant”) pursuant to LR IA 6-1, with
2 the stipulated consent of, Plaintiff Derek Land (“Plaintiff”), respectfully moves the Court for
3 an Order Extending Time for Defendant to file its Response to Plaintiff’s Objection to the
4 Attorneys Fees and Costs Order. [Dkt. # 94]. This is Defendant’s first request for an
5 extension of time relative to Plaintiff’s Objection. Defendant further states the following in
6 support of this request:

- 7 1) On January 13, 2025, the Court issued its order regarding Plaintiff’s Attorneys Fees and
8 Costs Motion. [Dkt. # 89.]
- 9 2) On January 23, 2025, Plaintiff filed his partial objection to the Magistrate Judge order
10 awarding attorney’s fees and costs. [Dkt. # 90.]
- 11 3) On January 24, 2025, the Court issued its amended order regarding Docket 89. [Dkt.
12 No. 91.]
- 13 4) On January 29, 2025, Plaintiff filed his notice of intention to file an objection regarding
14 the Amended Order. [Dkt. # 92.]
- 15 5) On February 10, 2025, Plaintiff filed this objection to the Court’s Amended Order.
16 [Dkt. # 94.]
- 17 6) Defendant’s response to Plaintiff’s objection is currently due Friday, February 28, 2025.
- 18 7) Due to family events, and numerous already calendared deadlines in other matters,
19 Defense Counsel has not had sufficient time to address the Opposition to Plaintiff’s
20 Objections.
- 21 8) On February 26, 2025, Defense Counsel communicated with Plaintiff’s Counsel
22 regarding an extension.
- 23 9) On February 27, 2025, Plaintiff’s Counsel responded that he did not object to this
24 request for an extension.
- 25 10) There is no reply deadline, and no hearing scheduled, that would be impacted by the
26 requested extension of time.

27 For the reasons stated and for good cause shown, Defendant respectfully requests entry
28 of an Order allowing Defendant to file its Opposition to Plaintiff’s Objection to the Court’s

1 Amended Order on or before March 7, 2024.

2 Dated: February 27, 2025

GORDON REES SCULLY MANSUKHANI

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4 By: s/ Sean P. Flynn

Sean P. Flynn (SBN 15408)

Attorneys for Defendant

ALLIED COLLECTION SERVICES,
INC.

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8 **IT IS SO ORDERED.**

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10 U.S. MAGISTRATE JUDGE

11 Dated: February 27, 2025

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